No. 06-757

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IN THE

Supreme Court of the United States

SETH MARINEAU, KATHLEEN MORRIS-KORTZ, DOUGLAS SHOIK, and RODNEY GRAHAM,

Petitioners,

v.

ZACHARY GUILES, by his father and next friend, Timothy Guiles; and by his mother and next friend Cynthia Lucas,

Respondent.

ON PETITION FOR A WRIT OF CERTIORARI TO THE UNITED STATES COURT OF APPEALS FOR THE SECOND CIRCUIT

BRIEF IN OPPOSITION

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COUNTER-STATEMENT OF THE QUESTION PRESENTED

Whether a public school student has a First Amendment right to wear a T-shirt criticizing President Bush for alleged alcohol and drug abuse, when the shirt neither contains plainly offensive language or images nor has disrupted the school's operations.

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INTRODUCTION

The school administrators who have petitioned this Court for certiorari in this case have gone to extraordinary lengths to justify punishing a student for wearing a political T-shirt that criticized President Bush for allegedly engaging in the very thing that they understandably oppose: the abuse of alcohol and drugs.

The school administrator petitioners' effort to censor Zachary Guiles' political views during the 2004 Presidential campaign is purportedly based on a dress code that prohibits all visual "displays" or "images" of alcohol and drugs. Cert. Pet. at 4, 48a. The school rule does not apply to verbal messages; nor does it take context into account. Hence a shirt emblazoned with the words "Take Heroin" in six-inch block letters passes literal muster under the school policy, while a T-shirt with the message "Just Say No To Alcohol," enhanced with an illustration of a beer can with the international "No" sign drawn through it, would trigger disciplinary action. Ct. App. A-340.

As the evidence at the trial and the Second Circuit opinion in this case make clear, the petitioners' claim that the mere viewing of illustrations of drugs or alcohol bottles on a T-shirt is per se harmful to students, even if an anti-drug message is communicated thereby, is without any basis in science or common sense.

The petitioners' gloom-and-doom suggestion that drug and alcohol programs in our public schools will be hamstrung unless the judgment below is reversed is wrong. We do not doubt, nor does the Second Circuit decision challenge, the constitutionality of school dress codes that prohibit the

wearing of items of clothing which glorify or promote the use of illegal substances. The Second Circuit's unanimous opinion by Judge Cardamone is explicitly limited to one student's T-shirt containing a political message *opposing* substance abuse.

The petitioners' claim that the Second Circuit opinion is in "direct conflict" with a decision of the Sixth Circuit is incorrect. The Marilyn Manson T-shirt at issue in the case relied upon by petitioners, *Boroff v. Van Wert City Board of Education*, 220 F.3d 465 (6th Cir. 2000), portrayed a rock musician known by students to be an advocate of illegal drug use, and the shirt had no political content.

The Second Circuit opinion is in harmony with prior decisions of this Court. The T-shirt's political message, like the black arm bands in *Tinker v. Des Moines Indep. Cmty. Sch. Dist.*, 393 U.S. 503 (1969), did not disrupt the school's educational operations or interfere with the rights of others. Unlike the articles in the student newspaper in *Hazelwood Sch. Dist. v. Kuhlmeier*, 484 U.S. 260 (1988), the student expression in this case was not school-sponsored. Nor did Zachary Guiles' T-shirt contain sexually explicit, vulgar, or plainly offensive language, which was the problem with the student's speech in *Bethel Sch. Dist. No. 403 v. Fraser*, 478 U.S. 675 (1986).

The petitioners' suggestion that this Court should permit the wholesale censorship of any student expression that school administrators consider "inappropriate" (the vague and utterly subjective legal standard proposed in the District Court's opinion) would effectively overrule *Tinker*, give authorities unfettered power to suppress unpopular views, and thereby render the First Amendment a virtual dead letter in our public schools.

COUNTER-STATEMENT OF THE CASE

A. Facts.

In the Spring of 2004, during the Presidential campaign, respondent Zachary Guiles was a 13 year-old seventh-grader at the Williamstown Middle High School, a Vermont public school that houses grades six through twelve in the same building. Ct. App. A-33. Zachary is an outstanding student. During his seventh grade year he took the SAT tests, achieving scores of 760 in math and 600 in English. Zachary was also the principal trombonist for the Vermont Youth Orchestra, with which he has performed in Carnegie Hall. Ct. App. A-85-86.

In March 2004 Zachary attended an anti-war rally on the Vermont statehouse lawn. There he donated $5.00 to the Vermont Green Party and received in return a T-shirt which criticizes President Bush's character and his Iraq war policy. In Zachary's words, he "wanted to have a T-shirt that expresses my political view." Ct. App. A-88-89.

The T-shirt describes President Bush as the "Chicken Hawk in Chief" who is engaged in a "World Domination Tour." The shirt accuses Mr. Bush of being an "AWOL draft-dodger," a "crook," a "lying drunk driver," and a "cocaine addict." Numerous illustrations enhance and dramatize the text, including a large caricature of a helmeted and chicken-bodied Mr. Bush, drawings of gushing oil wells, dollar signs, chickens, liquor bottles, a Minute Man drinking liquor, martini glasses, and cocaine lines, razor blades and straws. The Court of Appeals opinion describes the T-shirt in detail, and color photographs of it are reproduced in the Appendix to this Brief in Opposition.

Zachary wore the anti-Bush T-shirt to school approximately once a week for two months. According to the school principal, petitioner Kathleen Morris-Kortz, Zachary did so "without incident," and the shirt did not affect the academic mission of the school. Ct. App. A-364.

One pro-Bush classmate, Ashley Anderson, complained to some of their teachers about the shirt's politics, but they responded that the shirt was protected speech or that it did not violate school policy. Ct. App. A-97-100. One teacher was unsure whether the T-shirt "fit in" with the dress code and asked the principal for guidance. The principal told the teacher that she'd "look into it," but she took no action. Ct. App. 247-248.

During the second month that Zachary wore the anti-Bush T-shirt to school, his classmate Ashley Anderson noticed the illustrations of drugs on the shirt, and she informed Zachary that she might be able to get the shirt banned on that ground. Ct. App. A-95. On May 12, 2004, Zachary's class was scheduled to go on a school field trip together. Zachary was wearing the shirt, and Ashley and her mother (the school cheerleading coach and a chaperone for the class trip) walked up to him. Mrs. Anderson and Ashley stopped and stared at the shirt; then went directly into the office of the school official responsible for discipline, petitioner Seth Marineau, to report Zachary. Ct. App. S-151, Ct. App. A-103, A-152, A-185.

Mr. Marineau decided that the T-shirt violated that part of the school's dress code that prohibits students from "displaying alcohol, drugs, violence, obscenity, and racism." He presented Zachary with three choices: remove the shirt, wear it inside out, or place tape over the word "cocaine" and the drug and alcohol illustrations. Ct. App. A-106-108.

Zachary called his father, Tim Guiles, for advice. Ct. App. A-110. Mr. Guiles came to the school and spoke to Mr. Marineau. Then father and son went to see the Superintendent of Schools, petitioner Douglas Shiok, in an unsuccessful effort to persuade the administrators to allow Zachary to wear the shirt in school. Ct. App. A-111-114.

The next day, Zachary returned to school wearing his shirt uncensored. Zachary decided to do this because "it was concerning my free speech, and I think . . . free speech is a very important aspect of life." Ct. App. A-117. Mr. Marineau saw Zachary wearing the shirt and summoned him to his office. Zachary noticed that Mr. Marineau had a Holocaust Remembrance Day poster on his wall which included a Nazi swastika with a line or paperclip drawn through it as a symbol of opposition to anti-Semitism. Zachary pointed out to Mr. Marineau that the poster would violate the school's dress code if depicted on a student's clothing because the swastika is a symbol of racial hatred. Mr. Marineau responded by ripping the poster off the wall and throwing it into a trash can. Ct. App. A-119, 121-122, 164-166.

Mr. Marineau then gave Zachary the same three choices: remove the shirt, turn it inside out, or cover up the illustrations and the word "cocaine." Ct. App. A-119, 122. Zachary declined. Mr. Marineau filled out a disciplinary action form, Ct. App. A-33-34 and sent Zachary home for the remainder of the day. Ct. App. A-123. The form is a part of Zachary's disciplinary record at the school. Ct. App. A-16, 208.

Zachary returned to school the following morning with the drug and alcohol illustrations and the word "cocaine" covered with duct tape. Zachary wrote the word "censored" on each piece of tape. Mr. Marineau inspected the censored shirt and deemed it acceptable under the dress code. Ct. App. A-123-125.

The school has required the removal of student clothing such as Budweiser shirts and hats, which promote substance abuse. Ct. App. A-159. However, Zachary's anti-Bush T-shirt is the first item of clothing with political content that the school administration has ever banned or censored. Ct. App. A-161, 374-376. The school allows T-shirts with a pro-war, pro-administration slant, with slogans such as "Go Army," "U.S.A. No. 1," "Don't Mess With the U.S.A.," and "These Colors Don't Run." Ct. App. A-127.

There is an unwritten exception to the dress code ban that allows students to wear clothing that depicts drugs and alcohol while attending school-sponsored functions at which, in the words of School Superintendent Shiok, the school is able to exert "total control over the message." Ct. App. A-339-340.

B. Proceedings Below.

On May 27, 2004, Zachary Guiles filed a complaint under 42 U.S.C. § 1983, claiming that the school administrators had violated his First Amendment rights by suspending him from school and censoring the anti-Bush T-shirt. The complaint requested that the District Court issue an injunction barring school personnel from imposing further punishment on Zachary for wearing the T-shirt, and for an order expunging his disciplinary record. Ct. App. A-2, A-7-11.

During a three-day trial, the administrators conceded that they had violated Zachary's First Amendment rights by censoring the word "cocaine" on his T-shirt. Ct. App. A-194.

In an effort to justify the dress code's ban on all visual images or "displays" of drugs and alcohol on student clothing

no matter what the context, the defense relied upon the testimony of Carol Rosé, the Vermont official in charge of school drug and alcohol education programs. Ms. Rose endorsed an "environmental" approach to substance abuse prevention, meaning that students "are not hearing something in the classroom and then seeing a poster, an image, someone's clothing ... that depicts a counter message to what they received in the classroom." Ct. App. A-506-507. Ms. Rose theorized that a student looking at Zachary's T-shirt might conclude that substance abuse is no barrier to success in life. Ct. App. 520. Ms. Rose conceded, however, that she was unaware of any research linking the mere viewing of a political T-shirt such as Zachary's with drug or alcohol abuse by students. Nor was she aware of any scientific data to the effect that showing a student a bottle or a picture of a bottle would make that youngster more likely to abuse alcohol. Ct. App. A-525, 543-544.

William J. Reedy, Esq., the General Counsel of the Vermont Department of Education, the state agency that employs Ms. Rose, told the District Court that Ms. Rose's testimony "was not intended to draw any conclusions with respect to the outcome of the case or any substantive legal issue therein. To the extent that it did, it did not reflect an official position of the Commissioner or Department. . . ." Ct. App. A-35.

Charles Phillips, a former English teacher, athletic director, and principal at Montpelier High School who was named Vermont's "Principal of the Year" and inducted into the Vermont Principals Hall of Fame, testified that Montpelier High's dress code bans only student clothing that promotes alcohol and drug abuse. In Mr. Phillips' opinion, the sole function of the drug and alcohol illustrations on Zachary's

T-shirt was to make "a clear political statement" about President Bush's fitness for office, and that there was "no way" that a student could interpret them "to be a positive statement about the use of marijuana and alcohol." Mr. Phillips testified that a blanket ban on all drug symbols in school without regard to context is counter-productive because it "creates a climate where you can't talk about these things or not as apt to talk about them." Ct. App. A-433-434, 447-448, A-454-456.

Judge William K. Sessions, III of the District of Vermont held that the school administrators should not have censored the word "cocaine" on the T-shirt, and he ordered the expungement of Zachary's disciplinary record. However, Judge Sessions upheld the school's censorship of the illustrations of alcohol and drugs. He reasoned that under *Bethel Sch. Dist. No. 403 v. Fraser*, *supra*, school officials may censor any student speech that they deem "inappropriate." *Guiles v. Marineau*, 349 F. Supp. 871, 880-881 (D. Vt. 2004), Cert. Pet. App. 43a-44a.

Both sides appealed Judge Sessions' decision. The Court of Appeals for the Second Circuit affirmed the District Court's ruling against censorship of the word "cocaine" and its order expunging Zachary's disciplinary record. It vacated and remanded the lower Court's denial of injunctive relief against enforcement of the dress code with regard to Zachary's T-shirt. *Guiles v. Marineau*, 461 F.3d 320, 331 (2d Cir. 2006), Cert. Pet. App. 24a.

Judge Richard J. Cardamone, writing for a unanimous Court, determined that the District Court had read *Fraser* too broadly, and held that as a matter of law the illustrations on Zachary's shirt do not rise to the level of "plainly offensive" speech that *Fraser* permits schools to censor. *Id.* at 327, Cert. Pet. App. 16a.

Judge Cardamone wrote that

> while the exact contours of what is plainly offensive are not so clear to us as the star Arcturus is on a cloudless night, they are evident enough for us to hold that the images of drugs and alcohol on [Zachary's] T-shirt are not offensive, let alone plainly so, under *Fraser*. We believe this is especially so given that the messages are presented as part of an anti-drug T-shirt, and, moreover, a T-shirt with a political message.

461 F.3d at 330, Cert. Pet. App. at 22a.

The Court of Appeals held the political message of Zachary's T-shirt to be protected speech under the general rule of *Tinker v. Des Moines Indep. Cmty. Sch. Dist.*, *supra*, which allows students to express their political views absent evidence of school disruption. Judge Cardamone noted that "the parties agree that [Zachary's] T-shirt did not cause any disruption or confrontation in the school. Nor do defendants contend that they had a reasonable belief that it would." 461 F.3d at 330-331, Cert. Pet. App. at 22a-23a.

The Court of Appeals stressed that it was expressing no opinion as to whether "images of illegal drugs and alcohol on a T-shirt that promote drug and alcohol use could be censored under the Supreme Court's student speech cases." Judge Cardamone concluded, "We address only the images on [Zachary's] T-shirt and do not prejudge any question to be presented in a subsequent case." 461 F.3d at 331, Cert. Pet. App. at 23a-24a.

REASONS FOR DENYING THE PETITION

1. The Second Circuit decision is in harmony with the decisions of other federal circuits.

Contrary to petitioners' claim, this case is not "in direct conflict" with the decision of any other federal circuit. It is supported by other federal court decisions on student speech involving illustrations on T-shirts.

In *Newsom v. Albermarle County Sch. Bd.*, 354 F.3d 249, 252 (4th Cir. 2003), a middle-school principal had banned a student's pro-National Rifle Association T-shirt that "depicted three black silhouettes of men holding firearms" which they "appear[ed] to be aiming." The illustration of the "sharpshooters" on the shirt had raised in the principal's mind a troubling echo of "the shootings at Columbine High School in Colorado and other incidents of school-related violence." For that reason, she deemed it inappropriate in her "middle-school environment" and required the student to turn it inside-out.

The Fourth Circuit invalidated the ban on the T-shirt citing as authority *Tinker v. Des Moines Indep. Cmty. Sch. Dist.*, *supra*, because there was no evidence that the NRA T-shirt "ever substantially disrupted school operations or interfered with the rights of others." 354 F.3d at 259.

In *Castorina v. Madison County Sch. Bd.*, 246 F.3d 536 (6th Cir. 2001), the Sixth Circuit reversed a grant of summary judgment upholding a ban on T-shirts decorated with Confederate flags and pictures of the country music singer Hank Williams, Jr. The students testified that the T-shirts were intended to "express their southern heritage." *Id.* at 538.

The Court of Appeals acknowledged the existence of cases that have allowed bans on Confederate flag T-shirts where the shirts actually sparked fights in school. 246 F.3d at 543. In contrast, the display of the Confederate flag in the Hank Williams context "may not have had any significant disruptive effect." *Id.* at 543.

See also Barber v. Dearborn Public Schools, 286 F. Supp. 2d 847 (E.D. Mich. 2003), where the District Court issued an injunction against a ban on a student T-shirt which displayed a photo of President Bush with the caption "International Terrorist." The Court concluded that the school had not met its burden under *Tinker* of proving that disruption would result, even though many of the students and their parents were Iraqi refugees who had been oppressed under the Saddam Hussein regime.

The Sixth Circuit decision relied upon by the petitioners to establish a "direct conflict" between circuits, *Boroff v. Van Wert City Bd. of Educ.*, 220 F.3d 465, 470 (6th Cir. 2000), is distinguishable on it facts. *Boroff* involved a T-shirt that depicted the "Goth" rock star Marilyn Manson and a three-headed Jesus. The Court upheld censorship of the T-shirt, in part because Marilyn Manson was widely known to be "a drug user" who "promotes drug abuse." Moreover, the T-shirt was devoid of "any particular . . . political viewpoint." *Boroff* does not present a circuit conflict because Zachary's T-shirt case was political and contained an explicitly anti-drug message.

For the same reasons, the Second Circuit decision is readily distinguishable from *Fredrick v. Morse*, 439 F.3d 1114 (9th Cir. 2006), *cert. granted sub nom. Morse v. Frederick*, Docket No. 06-278. The "Bong Hits for Jesus" banner in

that case is on its face apolitical, and to the extent that it conveys any comprehensible message, it reasonably could be interpreted as favoring illegal drug use.

2. The Second Circuit decision is in harmony with prior decisions of this Court.

The Second Circuit decision painstakingly analyzed this Court's prior cases on student speech and properly applied them to the issue of whether Zachary's T-shirt is entitled to First Amendment protection. The Second Circuit correctly determined that *Tinker v. Des Moines Indep. Cmty. Sch. Dist.*, *supra*, governs the outcome.

In *Tinker*, public school students decided to wear black armbands to school to express opposition to the Vietnam War and their support for a truce. This Court held that the school dress code, which prohibited the wearing of all armbands, violated the students' First Amendment right to freedom of speech. The Court stressed that, in context, the wearing of the armbands was "closely akin to 'pure speech' which, we have repeatedly held, is entitled to comprehensive protection under the First Amendment." 393 U.S. at 506. Justice Fortas, writing for this Court, held that students are entitled to express their political views unless school authorities prove that the exercise of free speech creates a "material and substantial interference with schoolwork or discipline." *Id.* at 511.

School authorities in *Tinker* adopted the dress code after parents complained about the anti-war views of the students. This case is strikingly similar in that regard. Zachary wore his T-shirt in school for two months without incident until a pro-Bush student made clear that she would try to use the

dress code as a pretext to force him to stop wearing the shirt, and her mother, the school cheerleading coach, complained to petitioner Marineau. In both cases, the political content of the speech, rather than any actual disruption or reasonable fear of same, triggered official action to censor it.

Other aspects of this case strongly suggest that the Williamstown school's censorship of Zachary's T-shirt was motivated in significant part by the shirt's political content. The school principal, petitioner Morris-Kortz, knew that Zachary was wearing the shirt, but she took no action against him until the pro-Bush parent complained. Ct. App. A-247-248. School officials conceded at trial that Zachary's shirt was the first item of student clothing with a political viewpoint that they had ever banned or censored. Ct. App. A-161, 375-376. It was also undisputed below that the school permits students to wear T-shirts that support the Iraq war and pro-Bush administration views. Ct. App. A-127. The school has developed an unwritten exception to the dress code that allows student clothing depicting drugs and alcohol in circumstances where it can exert "total control over the message." Ct. App. A-339-340.

The two student speech cases issued by this Court post-*Tinker* provide no convincing legal justification for the censorship of Zachary's T-shirt.

Hazelwood Sch. Dist. v. Kuhlmeier, *supra*, involving articles in a student newspaper, permits censorship of student expression if it is "reasonably related to legitimate pedagogical concerns," but only when such expression is "school-sponsored," 484 U.S. at 273, which Zachary's T-shirt was not.

Bethel Sch. Dist. v. Fraser, *supra* upheld disciplinary action against a student who delivered a speech to his high school assembly supporting a candidate for student council because of his alleged sexual prowess. Chief Justice Burger, writing for the Court, reasoned that discipline did not violate the First Amendment because "The pervasive sexual innuendo in Fraser's speech was plainly offensive to both teachers and students – indeed to any mature person." 478 U.S. at 683.

Relying on *Fraser*, the District Court in this case gave its imprimatur to the censorship of Zachary's T-shirt because school authorities had deemed its illustrations offensive in the watered-down sense of being "inappropriate." According to Judge Sessions, *Fraser* should be read to permit the censorship of merely "inappropriate" speech "even if that speech has political content." *Guiles v. Marineau*, *supra*, 349 F.Supp.2d at 879, Cert. Pet. App. 41a. Petitioners have adopted that argument here.

The Second Circuit correctly observed that the "flaw in this position is that it conflates the rule of *Hazelwood* with *Fraser*, and in doing so, eviscerates *Tinker*." *Guiles v. Marineau*, *supra*, 461 F.3d at 330, Cert. Pet. App. 21a. Stretching the phrase "plainly offensive" to encompass any student expression that school authorities deem "inappropriate" would effectively overrule *Tinker's* easily understood, objective standard, and substitute a vague subjectivity that knows no limits.

This Court in *Hazelwood*, its most recent decision on student speech, expressly reaffirmed the vitality of *Tinker* and its general rule that students "cannot be punished merely for expressing personal views on school premises . . . unless school authorities have reason to believe that such expression will 'substantially interfere with the work of the school or impinge upon the rights of other students.'" *Hazelwood*, *supra*, 484 U.S. at 266, quoting *Tinker*, *supra*, 393 U.S. at 509.

This is a relatively simple and straightforward First Amendment case. The general rule of *Tinker* applies to the text and illustrations on Zachary's T-shirt and protects its political, anti-drug message from censorship by school officials. The Second Circuit was right to so hold.

CONCLUSION

This Court should deny the petition for writ of certiorari.

Respectfully submitted,

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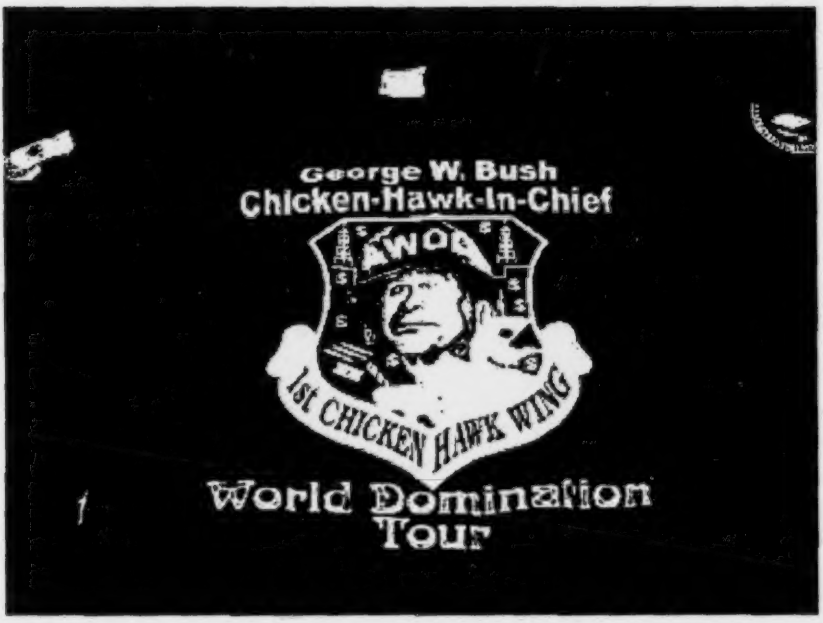
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